



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

# STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: August 4, 2023 Effective Date: August 4, 2023

Expiration Date: August 3, 2028

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

# State Only Permit No: 15-00037

Synthetic Minor

Federal Tax Id - Plant Code: 23-2720663-1

	Owner Information				
Name: IDEMIA AMER CORP					
Mailing Address: 523 JAMES HANCE CT					
OAKLANDS CORP CTR					
EXTON, PA 19341-2560					
	Plant Information				
Plant: IDEMIA AMER/EXTON					
Location: 15 Chester County	15971 West Whiteland Township				
SIC Code: 2752 Manufacturing - Commercial	Printing, Lithographic				
	Responsible Official				
Name: MARCELO SILVA					
Title: GENERAL MANAGER					
Phone: (610) 524 - 2653	Email: marcelo.silva@idemia.com				
Permit Contact Person					
Name: CHRIS SIMIONE					
Title: EHS MGR					
Phone: (610) 524 - 2654	Email: christopher.simione@idemia.com				
[Signature]					
JAMES D. REBARCHAK, SOUTHEAST REGIO	ON AIR PROGRAM MANAGER				



# **SECTION A. Table of Contents**

# Section A. Facility/Source Identification

Table of Contents Site Inventory List

# Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

#### Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

# Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

# Section E. Source Group Restrictions

E-I: Restrictions



IDEMIA AMER/EXTON



# **SECTION A. Table of Contents**

E-II: Testing Requirements
E-III: Monitoring Requirements
E-IV: Recordkeeping Requirements
E-V: Reporting Requirements
E-VI: Work Practice Standards
E-VII: Additional Requirements

# Section F. Alternative Operating Scenario(s)

F-I: Restrictions

F-II: Testing Requirements
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

# Section G. Emission Restriction Summary

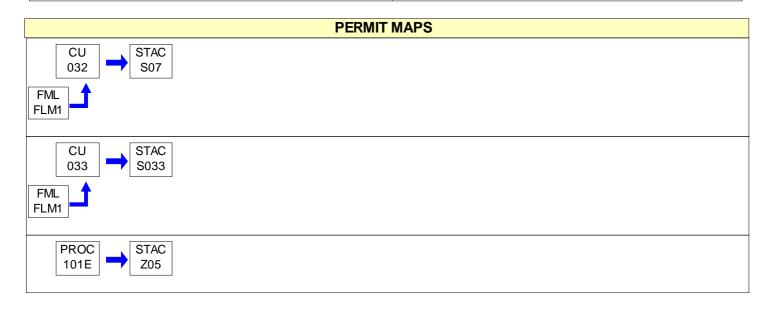
# Section H. Miscellaneous



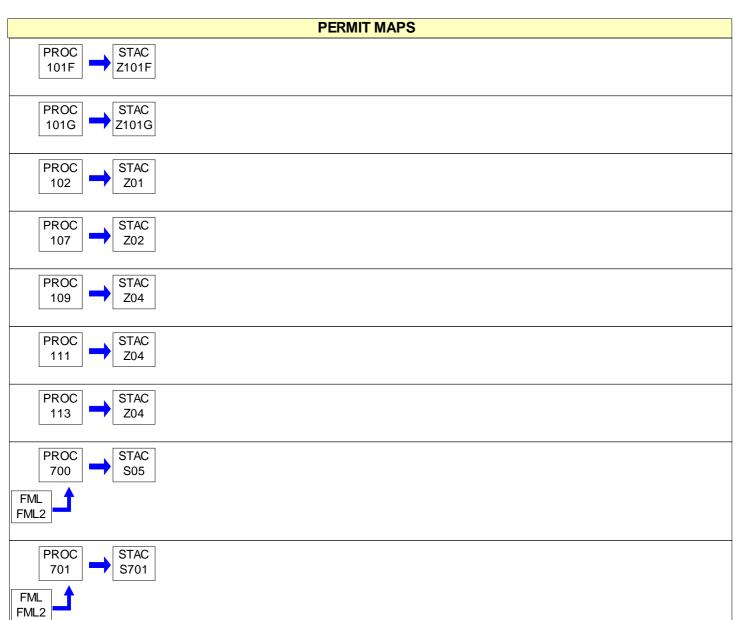


# **SECTION A.** Site Inventory List

Source	ID Source Name	Capacity	/Throughput	Fuel/Material
032	ROOF HEATERS	524.000	CF/HR	Natural Gas
033	TWO HONEYWELL BOILERS	0.900	MMBTU/HR	
		439.000	CF/HR	Natural Gas
101E	SCREEN PRESS NO. 3		N/A	INK AND SOLVENT
101F	SCREEN PRESS NO. 4		N/A	INKS AND SOLVENT
101G	SCREEN PRESS NO. 5		N/A	INKS, ADHESIVES, PRES
102	SCREEN WASHING SYSTEM	1.000	Lbs/HR	INK AND SOLVENT
107	MIXING ACTIVITIES (SCREEN)		N/A	INK AND SOLVENT
109	LITHO PRESS #4		N/A	INK AND SOLVENT
111	LITHOGRAPHIC PRESS #6		N/A	INK AND SOLVENT
113	LITHO PRESS #7		N/A	UVINKS
700	34HP EMERGENCY GENERATOR	2.000	Gal/HR	Diesel Fuel
701	50KW KATOLIGHT EMERG GENERATOR	2.570	Gal/HR	Diesel Fuel
FLM1	NATURAL GAS LINE			
FML2	DIESEL STORAGE TANK			
S033	HONEYWELL BOILER STACKS			
S05	EM. GEN. STACK			
S07	ROOF HEATING UNIT STACK			
S701	50KW KATOLIGHT STACK			
Z01	SCREEN WASHING SYSTEM			
Z02	MIXING ACTIVITY FUGITIVE			
Z04	LITHO PRESS ROOM FUGITIVE			
Z05	SCREEN PRESS ROOM FUGITIVE			
Z101F	SCREEN NO. 4 EMISSIONS			
Z101G	SCREEN PRESS NO. 5 - FUGITIVE			







# IDEMIA AMER/EXTON



# **SECTION B.** General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

**Operating Permit Duration.** 

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]

#### Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
  - (1) For a synthetic minor facility, a fee equal to:
    - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
    - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
    - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.



- (2) For a facility that is not a synthetic minor, a fee equal to:
  - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
  - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
  - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

# **Transfer of Operating Permits.**

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

# #006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

### Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
  - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

# #007 [25 Pa. Code §§ 127.441 & 127.444]

# Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:



- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

**Duty to Provide Information.** 

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

**Operating Permit Modifications** 

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:



- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

# #013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

# #014 [25 Pa. Code § 127.3]

#### Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)



- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#### #015 [25 Pa. Code § 127.11]

# Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

# #016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

# #017 [25 Pa. Code § 121.9]

# Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#### #018 [25 Pa. Code §§ 127.402(d) & 127.442]

# Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such



records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

# #019 [25 Pa. Code §§ 127.441(c) & 135.5]

# Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

# #020 [25 Pa. Code §§ 127.441(c) and 135.5]

#### Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

# #021 [25 Pa. Code § 127.441(a)]

**Property Rights.** 

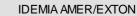
This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]

**Alternative Operating Scenarios.** 

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.







# **SECTION B. General State Only Requirements**

#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

**Report Format** 

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.



#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §121.7]

#### Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

# # 002 [25 Pa. Code §123.1]

# Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
  - (1) Construction or demolition of buildings or structures.
  - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

# # 003 [25 Pa. Code §123.2]

# **Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

# # 004 [25 Pa. Code §123.31]

# Limitations

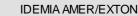
A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

# # 005 [25 Pa. Code §123.41]

# Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour; or
- (b) Equal to or greater than 60% at any time.





# # 006 [25 Pa. Code §123.42]

#### **Exceptions**

The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

#### # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

Hazardous air pollutant (HAP) emissions from the site shall be restricted to the following:

- (a) For each individual HAP: 9.99 tons per 12-month rolling period
- (b) For total HAP: 24.99 tons per 12-month rolling period

#### # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

Facility-wide VOC emissions shall not exceed 24.99 tons per year, based on a 12-month rolling sum.

#### # 009 [25 Pa. Code §129.14]

#### Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

# II. TESTING REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.



#### III. MONITORING REQUIREMENTS.

# # 011 [25 Pa. Code §123.43]

# Measuring techniques

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements; or
- (b) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

# # 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) The permittee shall monitor the facility, once per operating day, for the following:
  - (1) Odors which may be objectionable (as per 25 Pa. Code §123.31).
  - (2) Visible Emissions (as per 25 Pa. Code §§123.41 and 123.42).
  - (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
  - (1) Be investigated;
  - (2) Be reported to the facility management, or individual(s) designated by the permittee;
  - (3) Have appropriate corrective action taken (for emissions that originate on-site); and
  - (4) Be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 013 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s);
- (b) The cause of the event; and
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

# # 014 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) emissions increase of minor significance without notification to the Department.
- (b) de minimis increases with notification to the Department, via letter.
- (c) increases resulting from a Request for Determination (RFD) to the Department.
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

# # 015 [25 Pa. Code §127.441]

Operating permit terms and conditions.



Unless otherwise stated, all records required per this operating permit shall be maintained for a minimum of five (5) years and made readily available upon request.

# # 016 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall calculate and maintain records for total facility-wide VOC emissions on a monthly and 12-month rolling sum basis.

#### # 017 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall calculate and maintain records for individual HAP emissions on a monthly and 12-month rolling sum basis.
- (b) The permittee shall calculate and maintain records for total facility-wide HAP emissions on a monthly and 12-month rolling sum basis.

#### V. REPORTING REQUIREMENTS.

# # 018 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
  - (1) Name, permit or authorization number, and location of the facility;
  - (2) Nature and cause of the malfunction, emergency or incident;
  - (3) Date and time when the malfunction, emergency or incident was first observed;
  - (4) Expected duration of excess emissions;
  - (5) Estimated rate of emissions; and
  - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.
- (e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.
- (f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.





(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

# # 019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 CFR Part 68.]

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

# # 020 [25 Pa. Code §135.3]

# Reporting

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.441 and 127.511]

(a) The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all previously

reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

(b) The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 021 [25 Pa. Code §123.1]

# Prohibition of certain fugitive emissions

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

#### # 022 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #013(g), of Section B, of this permit.

# # 023 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

# # 024 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall ensure that the source(s) and air pollution control device(s), listed in this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

#### # 025 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Odors noticed at the site boundaries, that may be considered as malodors by the Department, shall be:

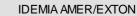
- (a) Reported to the appropriate environmental staff of the facility;
- (b) Investigated; and
- (c) Corrected appropriately.

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VIII. COMPLIANCE CERTIFICATION.







# **SECTION C.** Site Level Requirements

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

# IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.



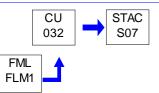
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# **SECTION D.** Source Level Requirements

Source ID: 032 Source Name: ROOF HEATERS

Source Capacity/Throughput: 524.000 CF/HR Natural Gas



#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §123.22]

**Combustion units** 

A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of 1.2 pounds per million Btu of heat input.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

Per RACT Operating Permit No. OP-15-0037, the combined VOC emissions from all combustion sources at the facility (including both external and internal combustion units) shall not be greater than 3 pounds per hour, 15 pounds per day, or 2.7 tons per year, whichever is most stringent.

# Fuel Restriction(s).

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use natural gas as fuel for Source ID 032.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall monitor the following operating parameters for Source ID 032 to demonstrate compliance with the VOC RACT limits:
  - (1) The average hourly amount of fuel consumed based on monthly usage in a method approved by the Department;
  - (2) The type of fuel;
  - (3) Hours of operation on daily basis.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, the combined potential emissions of VOC from all combustion units (internal and external combustion units) cannot exceed the VOC RACT limits.





# **SECTION D.** Source Level Requirements

(c) The permittee shall monitor VOC emissions to demonstrate compliance with the facility-wide VOC emission limit.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep appropriate records to demonstrate that this source (Source ID 032) is being maintained and operated in accordance with manufacturer's specifications.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall record the following operating parameters for Source ID 032 to demonstrate compliance with the VOC RACT limits:
  - (1) The average hourly amount of fuel consumed based on monthly usage in a method approved by the Department;
  - (2) The type of fuel;
  - (3) Hours of operation on daily basis.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, the combined potential emissions of VOC from all combustion units (internal and external combustion units) cannot exceed the VOC RACT limits.
- (c) On a monthly and 12-month rolling basis, the permittee shall record VOC emissions to demonstrate compliance with the facility-wide VOC emission limit.

# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

# VI. WORK PRACTICE REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

The permittee shall maintain and operate this source (Source ID 032) in accordance with manufacturer's specifications.

# VII. ADDITIONAL REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 032 consists of the following sources:

Unit Number	Manufacturer	Model No.	Heat Rating BTU/Hr	
101	Trane	YCD150D4L0BB	350,000	
103	York	ZS-25N30P4A1AAA1A2	300,000	
104	Trane	YCD180B4LAHB	350,000	
105	Trane	YSC060G4RB23	130,000	



# **SECTION D.** Source Level Requirements

106	Trane	SFHDC304HH00C5DB1011	600.000	
107	York	D2CG180N32046ECE	208,000	
108	Trane	YSC060E4RLA1N	130,000	
109	Trane	YSC060G4RMA01	130,000	
110	Trane	YSC060E4RHA1N	130,000	
111	Trane	SFHLF254LR10A4BD1D0100C0000000W0M0000	500,000	
112	Trane	SFHFC254LC00A5EB1011BL	500,000	
113	Trane	YSC120F4RLA0B	250,000	
115	Trane	YCD241C4HCAA	333,300	
116	Trane	SFHDC304HH00C5DB1D11	600,000	
201	Trane	YCD121C4H0AA	250,000	
202	Trane	YCD330A4LC2B5CG1ACF	205,000	
203	Trane	YHC063A4RHA1JDOB	130,000	
204	Trane	YCD181C4LOAA	350,000	
205	Trane	YSC090A4RHA32	200,000	
206	Trane	YSC060G4RMA01	130,000	
207	Trane	YCD241C4HOAA	333,300	
208	Trane	YSC090ARHA31	200,000	
209	Trane	YSC120A4RHA39	166,000	
210	Trane	SFHFC304PR00E39D7011ABEGLRTY685	500,000	
211	Trane	SFHFC304PR00E39D7011ABEGLRTY685	500,000	
212	Trane	YCD060C4L0AA	350,000	
213	Trane	YCD180B4LOHB	350,000	
214	Trane	YSC120A4RHA39	166,000	
215	Trane	YDC180B4LOHB	291,700	
216	Trane	YDC180B4LOHB	291,700	
217	Trane	YHD240F4RHA0300000	333,300	
218	Trane	YCD120C4LGAC	250,000	



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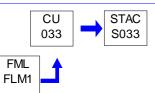


# **SECTION D.** Source Level Requirements

Source ID: 033 Source Name: TWO HONEYWELL BOILERS

Source Capacity/Throughput: 0.900 MMBTU/HR

439.000 CF/HR Natural Gas



#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §123.22]

**Combustion units** 

A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of 1.2 pounds per million Btu of heat input.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

Per RACT Operating Permit No. OP-15-0037, the combined VOC emissions from all combustion sources at the facility (including both external and internal combustion units) shall not be greater than 3 pounds per hour, 15 pounds per day, or 2.7 tons per year, whichever is most stringent.

# Fuel Restriction(s).

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 033 shall only use natural gas for combustion.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall monitor the following operating parameters for Source ID 033 to demonstrate compliance with the VOC RACT limits:
  - (1) The average hourly amount of fuel consumed based on monthly usage in a method approved by the Department;
  - (2) The type of fuel;
  - (3) Hours of operation on daily basis.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, the combined potential emissions of VOC from all combustion units (internal and external combustion units) cannot exceed the VOC RACT limits.



# **SECTION D.** Source Level Requirements

(c) The permittee shall monitor VOC emissions to demonstrate compliance with the facility-wide VOC emission limit.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall record the following operating parameters for Source ID 032 to demonstrate compliance with the VOC RACT limits:
  - (1) The average hourly amount of fuel consumed based on monthly usage in a method approved by the Department;
  - (2) The type of fuel;
  - (3) Hours of operation on daily basis.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, the combined potential emissions of VOC from all combustion units (internal and external combustion units) cannot exceed the VOC RACT limits.
- (c) On a monthly and 12-month rolling basis, the permittee shall record VOC emissions to demonstrate compliance with the facility-wide VOC emission limit.

# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

# VI. WORK PRACTICE REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate this source (Source ID 033) in accordance with manufacturer's specifications.

# VII. ADDITIONAL REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 033 consists of two (2) natural gas fired boilers, each rated at 450,000 Btu/hr, manufactured by Honeywell, Model No. F450-W-G1.



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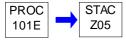


# **SECTION D.** Source Level Requirements

Source ID: 101E Source Name: SCREEN PRESS NO. 3

Source Capacity/Throughput: N/A INK AND SOLVENT

Conditions for this source occur in the following groups: ALL SCREEN PRESSES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Screen Press No. 3 is manufactured by SPS Rehmus, Model No. Vitessa XP1+.



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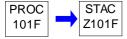


# **SECTION D.** Source Level Requirements

Source ID: 101F Source Name: SCREEN PRESS NO. 4

Source Capacity/Throughput: N/A INKS AND SOLVENT

Conditions for this source occur in the following groups: ALL SCREEN PRESSES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VII. ADDITIONAL REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Screen Press No. 4 is manufactured by Sakurai, Model Maestro-80A. The dryer associated with this source is manufactured by Natgraph, Model No. 90.

(b) The facility designation for this source is Press "504".



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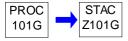


# **SECTION D.** Source Level Requirements

Source ID: 101G Source Name: SCREEN PRESS NO. 5

Source Capacity/Throughput: N/A INKS, ADHESIVES, PRESSWASH

Conditions for this source occur in the following groups: ALL SCREEN PRESSES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VII. ADDITIONAL REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Screen Press No. 5 is manufactured by Sakurai, Model No. MS80A11. The dryer associated with this source is manufactured by Natgraph, Model No. 90.
- (b) The facility designation for this source is Press "505".



# **SECTION D.** Source Level Requirements

Source ID: 102 Source Name: SCREEN WASHING SYSTEM

Source Capacity/Throughput: 1.000 Lbs/HR INK AND SOLVENT

PROC STAC Z01

#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

# II. TESTING REQUIREMENTS.

# # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall test each ink, solvent, adhesive, and coating used for density, VOC content, and hazardous air pollutant (HAP) content by using a Department approved method.
- (b) The permittee may be exempt from the test mentioned in subparagraph (a) above for inks, solvents, adhesives, and coatings that are supplied with a Certified Product Data Sheet (CPDS) or a Department approved documentation that is equivalent, which states the density, VOC content, and HAP content.

# III. MONITORING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor this source in the following manner:

- (a) Monitor and calculate monthly emissions using emission factor based on the number of screens cleaned.
- (b) Calibrate the emission factor based on annual material balance completed in conjunction with AIMS statement.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following items for Source ID 102:

- (a) Amount of monthly usage of solvent(s) in a method approved by the Department, and;
- (b) Hours of operation on a monthly basis.

# IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

The permittee shall keep records of this source in the following manner:

- (a) Record monthly emissions using emission factor based on the number of screens cleaned.
- (b) Record the emission factor based on annual material balance completed in conjunction with AIMS statement.

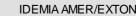
# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall maintain records of the following items for Source ID 102:
- (1) Amount of monthly usage of solvent(s) in a method approved by the Department;







# **SECTION D.** Source Level Requirements

- (2) Hours of operation on a monthly basis.
- (b) The permittee shall maintain record of all the calculations performed to determine VOC emissions from Source ID 102.
- (c) The permittee shall maintain records of CPDS and SDS documentation, which states the density, VOC content, and HAP content of all inks, solvents, adhesives, and coatings used.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

- (a) The lids of containers and drums which hold VOC-containing solvents shall always be closed, except when materials are being added to or taken from containers or drums, or are being prepared for use.
- (b) Rags used for cleaning will be wetted by using plunger cans, squeeze bottles or other containers that limit fugitive VOC emissions. Used rags will be stored in closed containers.
- (c) Any spills of solvents or any VOC-containing product shall be cleaned as soon as possible.
- (d) Use good housekeeping to reduce fugitive VOC emissions.

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





# SECTION D. Source Level Requirements

Source ID: 107 Source Name: MIXING ACTIVITIES (SCREEN)

Source Capacity/Throughput: N/A INK AND SOLVENT

PROC STAC Z02

#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

The VOC emission rates from these Mixing Activities shall not be greater than 3 pounds per hour, 15 pounds per day, or 2.7 tons per year, whichever is most stringent.

# II. TESTING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall test each ink, solvent, adhesive, and coating used for density, VOC content, and hazardous air pollutant (HAP) content by using a Department approved method.
- (b) The permittee may be exempt from the test mentioned in subparagraph (a) above for inks, solvents, adhesives, and coatings that are supplied with a Certified Product Data Sheet (CPDS) or a Department approved documentation that is equivalent, which states the density, VOC content, and HAP content.

#### III. MONITORING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

- (a) The permittee shall monitor the following items for Source ID 107 to demonstrate compliance with the VOC RACT limits:
  - (1) Amount and number of inks mixed per day;
  - (2) Type of inks mixed per day;
  - (3) Density and VOC content of inks, solvents, and adhesives;
  - (4) Daily hours of operation; and,
  - (5) Average daily actual VOC emissions.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, potential emissions of VOC cannot exceed the VOC RACT limits.
- (c) The permittee shall monitor VOC emissions for this source to demonstrate compliance with the VOC emission limits.

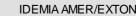
#### IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.95]

(a) The permittee shall maintain records of the following items for Source ID 107 to demonstrate compliance with the VOC RACT limits:





# **SECTION D.** Source Level Requirements

- (1) Amount and number of inks mixed per day;
- (2) Type of inks mixed per day;
- (3) Density and VOC content of inks, solvents, and adhesives;
- (4) Daily hours of operation; and,
- (5) Average daily actual VOC emissions.
- (b) The permittee may alternatively demonstrate compliance with paragraph (a) above by demonstrating that at maximum operating parameters, potential emissions of VOC cannot exceed the VOC RACT limits.
- (c) On a monthly and 12-month rolling basis, the permittee shall record VOC emissions for this source to demonstrate compliance with the VOC emission limits.
- (d) The permittee shall maintain record of all the calculations performed to determine VOC emissions from this Source ID 107.
- (e) The permittee shall maintain records of CPDS and SDS documentation, which states the density, VOC content, and HAP content of all inks, solvents, adhesives, and coatings used.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

- (a) The lids of containers and drums which hold VOC-containing inks, solvents, thinners, etc. shall always be closed, except when materials are being added to or taken from containers or drums, or are being prepared for use.
- (b) Rags used for cleaning will be wetted only by using plunger cans, squeeze bottles, or other containers that limit fugitive VOC emissions. Used rags will be stored in closed containers.
- (c) Any spills of inks, solvents, and thinners shall be cleaned as soon as possible.

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



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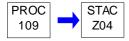
# **SECTION D.** Source Level Requirements

Source ID: 109 Source Name: LITHO PRESS #4

Source Capacity/Throughput: N/A INK AND SOLVENT

Conditions for this source occur in the following groups: ALL LITHO PRESSES 1

ALL LITHO PRESSES 2



# I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum VOC content of the lithographic ink used on this press shall not be more than 3% by weight.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Lithographic Press #4 is manufactured by Heidelberg Speedmaster, Model No. 72 SP+L.



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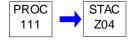
# **SECTION D.** Source Level Requirements

Source ID: 111 Source Name: LITHOGRAPHIC PRESS #6

Source Capacity/Throughput: N/A INK AND SOLVENT

Conditions for this source occur in the following groups: ALL LITHO PRESSES 1

ALL LITHO PRESSES 2



# I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Lithographic Press #6 is a 7-color non-heatset fed lithographic press, manufactured by Heidelberg Speedmaster, Model No. CED74-Format"C".



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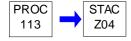
# **SECTION D.** Source Level Requirements

Source ID: 113 Source Name: LITHO PRESS #7

Source Capacity/Throughput: N/A UV INKS

Conditions for this source occur in the following groups: ALL LITHO PRESSES 1

ALL LITHO PRESSES 2



# I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The 6-color non-heatset sheetfed lithographic press shall be designated Litho Press #7 and manufactured by Komori, Model No. Lithrone 28.



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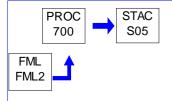


# **SECTION D.** Source Level Requirements

Source ID: 700 Source Name: 34HP EMERGENCY GENERATOR

Source Capacity/Throughput: 2.000 Gal/HR Diesel Fuel

Conditions for this source occur in the following groups: TWO EGENS



# I. RESTRICTIONS.

# **Operation Hours Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

This emergency generator (Source ID 700) shall not operate more than 500 hours in a consecutive twelve (12) month period.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VII. ADDITIONAL REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source (Source ID 700) is a 34-hp emergency generator, manufactured by Onan, Model 20DL4L 1337 E.



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# **SECTION D.** Source Level Requirements

Source ID: 701 Source Name: 50KW KATOLIGHT EMERG GENERATOR

Source Capacity/Throughput: 2.570 Gal/HR Diesel Fuel

Conditions for this source occur in the following groups: TWO EGENS



# I. RESTRICTIONS.

# **Emission Restriction(s).**

### # 001 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

Emissions of nitrogen oxides (NOx) from this source, combined with all other internal combustion engines that have been installed at the site as a source exempt from a Plan Approval, shall be less than the following:

- (a) 100 lbs/hr;
- (b) 1000 lbs/day;
- (c) 2.75 tons per ozone season; and,
- (d) 6.6 tons per year on a 12-month rolling basis

# II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall perform and maintain records of NOx emission calculations based on the hours of operation and AP-42/rated capacity emission factors (i.e. hours multiplied by a set factor), in order to demonstrate compliance with the exempt engine limits (in pounds per hour, pounds per day, tons per ozone season, and tons per 12-month rolling basis).

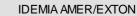
# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).







# **SECTION D.** Source Level Requirements

# VII. ADDITIONAL REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source is a 50-kW diesel powered emergency generator, manufactured approximately in 1996 by Katolight/Perkins, Model D50FRP4. The power rating for this unit is approximately 67 hp.



Group Name: ALL LITHO PRESSES 1

Group Description: 25 Pa. Code § 129.67b requirements

Sources included in this group

ID	Name
109	LITHO PRESS #4
111	LITHOGRAPHIC PRESS #6
113	LITHO PRESS #7

### I. RESTRICTIONS.

# **Throughput Restriction(s).**

# # 001 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

As applies to the combined use of cleaning solvents used on all lithographic presses at the facility, the use of one or more cleaning solutions which does not meet the VOC composite partial vapor pressure or VOC content restrictions under Work Practice Requirements shall be limited to 110 gallons per year for the entire facility.

#### II. TESTING REQUIREMENTS.

# # 002 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

- (a) The composite partial vapor pressure of organic compounds in cleaning solutions shall be determined in accordance with 25 Pa. Code § 129.67b(j).
- (b) The vapor pressure of each single component compound in cleaning solutions shall be determined in accordance with 25 Pa. Code § 129.67b(k).

#### # 003 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

- (a) Sampling of an ink, varnish, coating, fountain solution or cleaning solution and testing for the VOC content of the ink, varnish, coating, fountain solution or cleaning solution shall be performed in accordance with the procedures and test methods specified in Chapter 139.
- (b) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with this section may be used if prior approval is obtained in writing from the Department and the EPA.

#### III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall monitor on a monthly basis the sitewide usage of VOC containing cleaning solvents used on all lithographic presses at the facility that do not meet the VOC composite partial vapor pressure or VOC content restrictions under Work Practice Requirements.

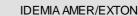
### IV. RECORDKEEPING REQUIREMENTS.

### # 005 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

(a) The permittee shall maintain records of cleaning solutions and fountain solutions used at the facility, including:





- (1) The following parameters for each press ready blanket, roller or other cleaning solution:
  - (i) The name and identification number for the blanket, roller or other cleaning solution.
  - (ii) The VOC content (weight %) or VOC composite partial vapor pressure of each cleaning solution as applied.
  - (iii) The volume used of each cleaning solution as applied, if the owner or operator is using cleaning solutions which exceed the VOC content limit or the VOC composite partial vapor pressure limit applicable to this source.
  - (iv) Records of cleaning solution monitoring as required under 25 Pa. Code § 129.67b(e)(3).
- (2) The following parameters for each press-ready (as applied) fountain solution:
  - (i) The VOC content (weight %).
  - (ii) Records of fountain solution monitoring as required under 25 Pa. Code § 129.67b(e)(2).
- (b) The permittee may group materials into classes using the highest VOC content in any material in a class to represent that class of material.

### # 006 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall record on a monthly basis and annually the sitewide usage (in gallons) of VOC containing cleaning solvents used on all lithographic presses at the facility that do not meet the VOC composite partial vapor pressure or VOC content restrictions under Work Practice Requirements.

### # 007 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall document and maintain records of the following:

- (a) Which method(s) from 25 Pa. Code § 129.67b(e)(2) is used to demonstrate compliance with the fountain solution VOC limits applicable to this source.
- (b) Which method(s) from 25 Pa. Code § 129.67b(e)(3) is used to demonstrate compliance with the cleaning solution VOC content limit or the VOC composite partial vapor pressure limit applicable to this source.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

# VI. WORK PRACTICE REQUIREMENTS.

#### # 008 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

The press-ready (as applied) fountain solution must meet one or more of the following VOC limits:

- (a) A VOC content of 5% or less by weight.
- (b) A VOC content of 8.5% or less by weight if the fountain solution is refrigerated below 60°F (15.5°C).
- (c) A VOC content of 5% or less by weight and no alcohol in the fountain solution.
- (d) Another method that achieves a level of control of VOC emissions from the press-ready (as applied) fountain solution



equal to or better than the methods listed in paragraphs (a) – (c), above.

### VII. ADDITIONAL REQUIREMENTS.

### # 009 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

If a portion of the VOCs contained in the ink or cleaning solution, or both, is retained in the printed web substrate or in the shop towels used for cleaning, the following VOC emission retention factors shall be used, as applicable:

- (a) A 20% VOC emission retention factor for a petroleum ink oil-based heatset ink printed on an absorptive substrate, meaning 80% of the petroleum ink oil content is emitted as VOC during the printing process and is available for capture and control by an add-on air pollution control device.
- (b) A 95% VOC emission retention factor for a petroleum ink oil-based non-heatset web or non-heatset sheet-fed ink, meaning 5% of the petroleum ink oil content is emitted as VOC during the printing process and is available for capture and control by an add-on air pollution control device.
- (c) A 100% VOC emission retention factor for vegetable ink oil-based heatset and non-heatset inks.
- (d) A 50% VOC emission retention factor for low VOC composite vapor pressure cleaning solutions in shop towels if both of the following conditions are met:
  - (1) The VOC composite vapor pressure of the cleaning solution is less than 10mm Hg at 20°C (68°F).
  - (2) The cleaning solutions and used shop towels are kept in closed containers.



Group Name: ALL LITHO PRESSES 2

Group Description: 25 Pa. Code § 127.441 requirements

Sources included in this group

ID	Name
109	LITHO PRESS #4
111	LITHOGRAPHIC PRESS #6
113	LITHO PRESS #7

### I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The volatile organic compound (VOC) weight percent of the ultraviolet (UV) inks used for the non-heatset sheetfed lithographic presses shall be less than or equal to one percent.

### II. TESTING REQUIREMENTS.

### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) The permittee shall test each ink, solvent, adhesive, and coating used for density, VOC content, and hazardous air pollutant (HAP) content by using a Department approved method.
- (b) The permittee may be exempt from the test mentioned in subparagraph (a) above for inks, solvents, adhesives, and coatings that are supplied with a Certified Product Data Sheet (CPDS) or a Department approved documentation that is equivalent, which states the density, VOC content, and HAP content.

# III. MONITORING REQUIREMENTS.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall monitor the following items for the non-heatset sheetfed lithographic presses on a monthly basis:

- (a) The total amount of inks, fountain solutions and additives, blanket and roller cleaning solutions, cleanup solvents, adhesives, and any other VOC or HAP containing materials used.
- (b) The total amount of VOC and HAP content in the inks, fountain solutions and additives, blanket and roller cleaning solutions, cleanup solvents, adhesives, and any other VOC or HAP containing materials used, as applied.
- (c) Hours of operation.

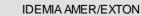
### IV. RECORDKEEPING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall record the following for the non-heatset sheetfed lithographic presses on a monthly basis:

- (a) The total amount of inks, fountain solutions and additives, blanket and roller cleaning solutions, cleanup solvents, adhesives, and any other VOC or HAP containing materials used.
- (b) The total amount of VOC or HAP content in the inks, fountain solutions and additives, blanket and roller cleaning solutions, cleanup solvents, adhesives, and any other VOC or HAP containing materials used, as applied.
- (c) A current list of inks, fountain solutions, cleanup solvents, and any other VOC or HAP containing materials used.
- (d) Hours of operation.
- (e) A record of all the calculations performed to determine VOC and HAP emissions on a 12-month rolling basis. The record of emissions shall be based on a mass balance calculation.





- (f) The total amount of VOC emissions from each non-heatset sheetfed lithographic press.
- (g) The total individual HAP emissions and total combined HAP emissions from each non-heatset sheetfed lithographic press.

### # 005 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall maintain records of CPDS and SDS documentation, which states the density, VOC content, and HAP content of all inks, solvents, adhesives, and coatings used.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

### # 006 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

- (a) The permittee shall meet one of the following requirements for VOC containing cleaning solvents, and blanket and roller cleaning solutions used on all of the non-heatset sheet fed lithographic presses:
  - (1) VOC content, as applied, is less than or equal to 30 percent by weight, or;
- (2) VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20 degrees Celsius (68 degrees Fahrenheit).
- (b) The use of one or more cleaning solutions with a higher VOC composite partial vapor pressure or higher VOC content, or both, than is listed in paragraph (a) above, is limited to a total facility-wide limit of 110 gallons per year.

[Compliance with this streamlined condition demonstrates compliance with 25 Pa. Code § 129.67b]

### # 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

- (a) Inks, fountain solutions, fresh and used cleanup solvents, and any other VOC containing materials used shall be stored in nonabsorbent, nonleaking containers that will always be kept closed and covered at all times, except when filling or emptying.
- (b) Rags, cloth, paper, or other absorbent applicator, which contain inks, fountain solutions, cleaning solvents, or any other VOC containing materials, shall be stored in closed, nonabsorbent, nonleaking containers when not being used.
- (c) Handling and transfer procedures shall minimize spills during filling and transferring of the inks, fountain solutions, and any other VOC containing materials to or from containers or the screen printing press.
- (d) Handling and transfer procedures shall minimize spills during filling and transferring of cleanup solvents to or from enclosed systems, vats, waste containers and other cleaning operation equipment that holds or stores fresh or used cleanup solvents.
- (e) Any spills of inks, fountain solutions, cleanup solvents, and any other VOC containing materials used shall be contained and cleaned up immediately.

[Compliance with this streamlined condition demonstrates compliance with 25 Pa. Code § 129.67b]

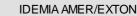
### # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall conduct introductory training to new employees, and annual refresher training to existing employees, who are involved in printing operations, to include the following:

(a) Appropriate ink application techniques.







# **SECTION E.** Source Group Restrictions.

- (b) Appropriate equipment setup and adjustment to minimize ink usage.
- (c) Appropriate techniques for handling, transfer and storage of inks, fountain solutions, and cleanup solvents.
- (d) Appropriate clean up and wash off procedures.
- (e) Appropriate management of cleanup wastes.

Training documentation of all printing operators shall be presented to the Department upon request.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this source in accordance with manufacturer's recommendations.

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



Group Name: ALL SCREEN PRESSES
Group Description: Shared conditions

Sources included in this group

ID	Name
101E	SCREEN PRESS NO. 3
101F	SCREEN PRESS NO. 4
101G	SCREEN PRESS NO. 5

### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

# # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall test each ink, solvent, adhesive, and coating used for density, VOC content, and hazardous air pollutant (HAP) content by using a Department approved method.
- (b) The permittee may be exempt from the test mentioned in subparagraph (a) above for inks, solvents, adhesives, and coatings that are supplied with a Certified Product Data Sheet (CPDS) or a Department approved documentation that is equivalent, which states the density, VOC content, and HAP content.

### III. MONITORING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor the following items for the screen printing press:

- (a) The total amount of inks, solvents, adhesives, and coatings used on a monthly basis.
- (b) The total amount of VOC content and HAP content in the inks, solvents, adhesives, and coatings, as applied, used on a monthly basis.
- (c) Hours of operation.

### IV. RECORDKEEPING REQUIREMENTS.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall record the following items for the screen printing press:

- (a) The total amount of inks, solvents, adhesives, and coatings used on a monthly basis.
- (b) The total amount of VOC content and HAP content in the inks, solvents, adhesives, and coatings, as applied, used on a monthly basis.
- (c) A current list of inks, solvents, adhesives, and coatings used.
- (d) Hours of operation.
- (e) A record of all calculations performed to determine VOC and HAP emissions on a 12-month rolling basis from the screen printing press. The record of emissions shall be based on a mass balance calculation.
- (f) The total amount of VOC emissions from the screen printing press.
- (g) The total individual HAP emissions and total combined HAP emissions from the screen press.

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# **SECTION E.** Source Group Restrictions.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall maintain records of CPDS and SDS documentation, which states the density, VOC content, and HAP content of all inks, solvents, adhesives, and coatings used.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

# VI. WORK PRACTICE REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The dryer associated with the screen printing press shall be electrically operated.

### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall operate and maintain the screen printing press in accordance with the manufacturer's recommendations.

## # 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

- (a) Inks, solvents, adhesives, and coatings shall be stored in nonabsorbent, nonleaking containers that will always be kept closed and covered at all times, except when filling or emptying.
- (b) Rags, cloth, or paper that contain inks, solvents, adhesives, and any other VOC containing materials, shall be stored in closed, nonabsorbent, nonleaking containers when not being used.
- (c) Rags, cloth, or paper used for cleaning will be wetted only by using plunger cans, squeeze bottles or other containers that limit fugitive VOC emissions.
- (d) Handling and transfer procedures shall minimize spills during filling and transferring of the inks, solvents, adhesives, and coatings to or from containers or the screen printing press.
- (e) Any spills of inks, solvents, adhesives, and coatings shall be cleaned as soon as possible.

# # 008 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permitte shall meet one of the following requirements for VOC containing cleaning solvents used on the screen press:

- (a) VOC content, as applied, is less than or equal to 30 percent by weight, or;
- (b) VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20 degrees Celsius (68 degrees Fahrenheit).

# # 009 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall conduct introductory training to new employees, and annual refresher training to existing employees, who are involved in printing operations, to include the following:

- (a) Appropriate ink application techniques.
- (b) Appropriate equipment setup and adjustment to minimize ink usage.
- (c) Appropriate techniques for handling, transfer and storage of inks and cleaning solvents.

Training documentation of all printing operators shall be presented to the Department upon request.



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# **SECTION E.** Source Group Restrictions.

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



Group Name: TWO EGENS
Group Description: Shared conditions

Sources included in this group

ID	Name
700	34HP EMERGENCY GENERATOR
701	50KW KATOLIGHT EMERG GENERATOR

# I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this emergency generator in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

#### **General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

Per RACT Operating Permit No. OP-15-0037, the combined VOC emissions from all combustion sources at the facility (including both external and internal combustion units) shall not be greater than 3 pounds per hour, 15 pounds per day, or 2.7 tons per year, whichever is most stringent.

# Fuel Restriction(s).

### # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only diesel or No. 2 oil as fuel for this emergency generator.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall obtain from the fuel oil supplier, a delivery receipt that certifies the percentage of sulfur, by weight, is less than or equal to 0.0015 percent, or 15 ppm, each time a delivery is made.

# **Operation Hours Restriction(s).**

# # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 63, Subpart ZZZZ]

- (a) This unit shall not be operated or be contractually obligated to be available for more than 15 hours per calendar year for the following purposes:
  - (1) Operating the unit for emergency demand response, as described in 40 CFR § 63.6640(f)(2)(ii);
  - (2) Operating the unit for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency; and,
  - (3) Operating the unit to supply power as part of a financial arrangement with another entity, as described in 40 CFR § 63.6640(f)(4)(ii).



- (b) This unit shall comply with all requirements of 40 CFR § 63.6640(f), unless otherwise stated in paragraph (a), above, such that it meets the definition of an emergency generator.
- (c) Compliance with paragraphs (a) and (b) deem this unit exempt from 40 CFR Part 63, Subpart ZZZZ, on the basis of 40 CFR § 63.6585(f)(3).

### II. TESTING REQUIREMENTS.

# # 007 [25 Pa. Code §139.16]

Sulfur in fuel oil.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.441]

- (a) The following are applicable to tests for the analysis of commercial fuel oil:
  - (1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code §139.4(10) (relating to references).
  - (2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).
- (b) The testing requirements in subpart (a), above, shall be waived in the event that a certified receipt, showing the percent sulfur in the fuel, is obtained from the fuel supplier each time a delivery is made.

#### III. MONITORING REQUIREMENTS.

# # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 63.6640(f) and 25 Pa. Code § 129.95]

- (a) The permittee shall monitor the hours of operation of each source on a daily basis, along with the purpose for which this source is operated each time it is operated.
- (b) The permittee shall monitor the hours of operation and the fuel usage of each source on a monthly basis and as a 12-month rolling sum.

### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and calculate daily and monthly VOC emissions based on daily readings of run-time meter and AP-42/rated capacity emission factors (i.e. hours multiplied by a set factor).

### IV. RECORDKEEPING REQUIREMENTS.

### # 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 63.6640(f) and 25 Pa. Code § 129.95]

- (a) The permittee shall record the hours of operation of each source on a daily basis, along with the purpose for which this source is operated each time it is operated.
- (b) The permittee shall record the hours of operation and the fuel usage of each source on a monthly basis and as a 12-month rolling sum.

# # 011 [25 Pa. Code §127.441]

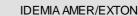
Operating permit terms and conditions.

The permittee shall keep records of the daily and monthly VOC emissions based on daily readings of run-time meter and AP-42/rated capacity emission factors (i.e. hours multiplied by a set factor).

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.







# **SECTION E.** Source Group Restrictions.

The permittee shall keep appropriate records to demonstrate that this emergency generator is being maintained and operated in accordance with manufacturer's specifications.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

The permittee shall operate and maintain this source in accordance with manufacturer's specifications.

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



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# **SECTION F.** Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





# **SECTION G.** Emission Restriction Summary.

Source Id	Source Description
032	ROOF HEATERS

<b>Emission Limit</b>		Pollutant	
1.200	Lbs/MMBTU	SO2	
2.700	Tons/Yr	VOC	
3.000	Lbs/Hr	VOC	
15.000	Lbs/Day	VOC	

033 TWO HONEYWELL BOILERS

<b>Emission Limit</b>		Pollutant
1.200	Lbs/MMBTU	SO2
2.700	Tons/Yr	VOC
3.000	Lbs/Hr	VOC
15.000	Lbs/Day	VOC

107 MIXING ACTIVITIES (SCREEN)

<b>Emission Limit</b>			Pollutant	
2.700	Tons/Yr	Determined on a 12-month rolling basis.	VOC	
3.000	Lbs/Hr		VOC	
15.000	Lbs/Day		VOC	

700 34HP EMERGENCY GENERATOR

<b>Emission Limit</b>			Pollutant
500.000	PPMV		SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC

701 50KW KATOLIGHT EMERG GENERATOR

<b>Emission Limit</b>			Pollutant
2.750	Tons/OZNESEAS		NOX
6.600	Tons/Yr	Based on a 12-month rolling sum	NOX
100.000	Lbs/Hr		NOX
1,000.000	Lbs/Day		NOX
500.000	PPMV		SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC

# **Site Emission Restriction Summary**

Emission Limit		Pollutant
24.990 Tons/Yr	12-month rolling basis	VOC
24.990 Tons/Yr	Applies to total HAP; Determined on a 12-month rolling period	Hazardous Air Pollutants



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# **SECTION G.** Emission Restriction Summary.

9.990 Tons/Yr Applies to individual HAP; Hazardous Air Pollutants

Determined on a 12-month rolling period

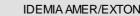


# SECTION H. Miscellaneous.

- (a) Reasonably Available Control Technology (RACT) Operating Permit No. OP-15-0037 serves as a basis for certain terms and conditions in this Title V Operating Permit.
- (b) This permit has been revised as a result of an appeal. Conditions for the following sources were revised to provide clarification of the monitoring and recordkeeping requirements:
  - (1) Svecia Screen Press (Source ID 101A)
  - (2) Adhesive Press (Source ID 101B)
  - (3) Screen Washing System (Source ID 102)
  - (4) Three (3) Heidelburg Lithographic Presses (Source ID 103)

Lithographic Press #4 (Source ID 109) was included from a previously issued federally enforceable permit.

- (c) The previously issued Plan Approval No. PA-15-0037 serves as a basis for certain terms and conditions for this administratively amended Title V Operating Permit to address revised VOC emission factors for Litho Press #5 (Source ID 110), which is approved for VOC emissions calculations for Litho Presses 1, 2 and 3. The Title V Operating Permit contains requirements to keep the facility operating within all applicable air quality requirements.
- (d) The Title V Operating Permit No. 15-00037 (APS ID: 345182, AUTH ID: 516917) has been renewed.
- (e) The renewed Title V Operating Permit No. 15-00037 (APS ID: 345182, AUTH ID: 680233) has been administratively amended to revise Condition #001(b) for Litho Press #4 (Source ID 109) to clarify the term "specialty cleaners", as it relates to the 2,100 lbs/yr VOC emission limit.
- (f) This Title V Operating Permit (APS ID: 345182, AUTH ID: 799901) has been administratively amended to incorporate the requirements of Plan Approval Nos. 15-0037B. 15-0037C, 15-0037D, and 15-0037E.
- (g) Under APS ID: 345182, AUTH ID: 800019, this Title V Operating Permit has been renewed for another 5-year term. Under the same authorization, the following minor changes have been made:
  - (1) Section C emission limits and recordkeeping requirements have been added for hazardous air pollutants (HAP) to ensure that the facility is not a major source of HAP.
  - (2) The source maps for Source IDs 101C, 101D, 101E, 103, 109, and 110, which previously reflected stack emission points, have been revised to reflect fugitive emission points.
  - (3) The requirements of Source ID 112 have been incorporated into Source IDs 101E and 111.
  - (4) Source ID 106 (12 Roof Heaters), which previously reflected a process in the Department's Air Information Management System, is now referenced as Source ID 032 to reflect that the heaters are combustion units, as defined under 25 Pa. Code Section 121.1; no changes have been made to the applicable conditions.
  - (5) Source IDs 101C, 101D, 101E, 102, 103, 110, 111, and 113 the testing requirement to test inks, solvents, adhesives, and/or coatings has been edited for clarity.
  - (6) Source IDs 107 and 109 a condition has been added to test inks, solvents, adhesives, and coatings when not accompanied by sufficient documentation to determine density, VOC content, and HAP content.
- (h) Under APS ID: 345182, AUTH ID: 1037875, this Title V Operating Permit has been renewed for another 5-year term. Under the same authorization, the following minor changes have been made:
  - (1) The Heat Exchange Boiler (Source ID 031) was decommissioned and removed from the operating permit.
  - (2) Source ID 032 has been renamed to Roof Heaters, as the number of roof heaters at the facility has increased and the exact number of units can change periodically.
  - (3) The permittee installed two natural gas fired boilers, each rated at 450,000 Btu/hr, manufactured by Honeywell, Model No. F450-W-G1. These two boilers are identified under Source ID 033.





# SECTION H. Miscellaneous.

- (4) The Source ID No. for the 34hp Emergency Generator has been changed from 104 to 700 to better group like sources at the facility.
- (5) The permittee installed a 50-kW diesel powered emergency generator, manufactured approximately in 1996 by Katolight/Perkins, Model D50FRP4. This source is identified under Source ID 701.
- (6) The Solvent Degreasers (Source ID 108) were decommissioned and removed from the operating permit.
- (7) The newly promulgated requirements of 25 Pa. Code § 129.67b have been incorporated into the operating permit.
- (8) Under RFD# 2495, the permittee installed a decapsulation process, which the Department has deemed an insignificant source. The decapsulation process is used to remove malfunctioning electronic chips from pvc cards manufactured by the permittee.
- (i) This Title V Operating Permit (APS ID: 345182, AUTH ID: 1154837) has been administratively amended to incorporate the requirements of Plan Approval Nos. 15-0037F and 15-0037G. This Title V Operating Permit also reflects a change in the Responsible Official from Jean Francois Durand (VP Global MFG Americas) to Marcelo Silva (General Manager MFG).
- (j) This Title V Operating Permit (APS ID: 345182, AUTH ID: 1213836) has been administratively amended to add conditions that were erroneously omitted from the last administrative amendment.
- (k) APS No. 345182; Authorization No. 1235269: This authorization is for an administrative amendment/Change of Ownership from Oberthur Technologies to Idemia America Corporation. In addition to the Change of Ownership, three sources (Source ID Nos. 101D, 103, and 114) were removed from the permit because they are no longer in operation at the facility.
- (I) On February 22, 2021, DEP approved the reduction of monitoring of visible emissions, fugitive emissions, and odors from daily to weekly monitoring.
- (m) This Title V Operating Permit (APS No. 345182; AUTH ID: 1292730) has been renewed for another 5-year term. Additionally, this Title V Operating Permit incorporates Plan Approval No. 15-0037H, for the renewal of the facility's Plantwide Applicability Limit (PAL) for VOC emissions.
- (n) This authorization is for an initial State Only Operating Permit 15-00037 (APS No. 1078710; AUTH ID 1422985).
  - This State Only Operating Permit 15-00037 supersedes all requirements of the previous Title V Operating Permit 15-00037.
- A facility-wide VOC emission limit of 24.99 tons per year has been established in Section C of this permit to ensure the facility maintains a Synthetic Minor status. The facility-wide HAP emission limit of 9.99 tons per year (for individual HAPs) and 24.99 tons per year (for total combined HAP) remains in effect.
- All previously established requirements under 25 Pa. Code § 127.218 for plantwide applicability limit (PAL) are no longer applicable.



\*\*\*\*\* End of Report \*\*\*\*\*